

UNITED STATES DISTRICT COURT
 for the
Eastern District of Michigan

United States of America

v.

D-1 Ruemondo MURRAY
 D-2 Regina BLANCHARD
 D-3 Shakira MAY
 D-4 Precious PREVOT
 D-5 Yalandra HARDRICK
 D-6 Tiffany SIMMONS
 D-7 Candace SIMMONS
 D-8 Tywana MURRAY

Case: 2:19-mj-30402

Judge: Unassigned

Filed: 07-30-2019

USA V MURRAY, ET AL. (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Oct. 12, 2018 through Dec. 12, 2018 in the county of Wayne and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 USC 922(a)(6)
 18 USC 2
 18 USC 371
 18 USC 922(g)(1)

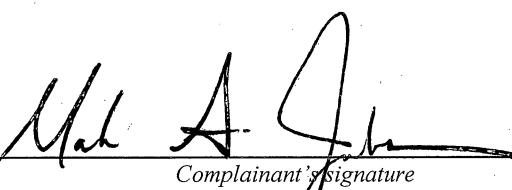
Offense Description

False statement during purchase of a firearm (D-2 - D-8 only)
 Aiding and abetting (All defendants)
 Conspiracy (All defendants)
 Possession of a firearm by a prohibited person (D-1 only)

This criminal complaint is based on these facts:

see attached affidavit.

Continued on the attached sheet.


Mark A. Jackson
 Complainant's signature

Mark A. Jackson, Special Agent (ATF)

Printed name and title


R. Steven Whalen
 Judge's signature

Sworn to before me and signed in my presence.

JUL 30 2019

Date: _____

City and state: Detroit, Michigan

Hon. R. Steven Whalen, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Mark A. Jackson, being duly sworn, hereby state the following:

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives in Detroit, Michigan since 2000. Prior to this, I was employed as a Senior Customs Inspector with the United States Customs Service in Detroit, Michigan, for approximately three and one-half years. Along with other training I have received, I am a certified law enforcement instructor and regularly teach firearms trafficking courses to ATF and other agencies both at the ATF Academy and at advanced firearms trafficking training courses in both the United States and Canada. I have participated in hundreds of investigations involving violations of federal firearms and narcotics laws, resulting in the arrest and convictions of numerous criminal defendants and the seizure of large quantities of firearms.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. I am conducting an investigation into violations of 18 U.S.C. § 922(a)(6) (false statement during purchase of a firearm) committed by multiple suspected straw purchasers, 18 U.S.C. § 2 (aid and abet) and 18 U.S.C. § 371 (conspiracy) committed by the multiple straw purchasers and Ruemondo MURRAY, and 18 U.S.C. § 922(g)(1) (possession of a firearm by a prohibited person) committed by Ruemondo MURRAY.

4. This affidavit is being submitted in support of an application for an arrest warrant for Regina BLANCHARD, Shakira MAY, Precious PREVOT, Yalandra HARDRICK, Tiffany SIMMONS, Candace SIMMONS, Tywana MURRAY, and Ruemondo MURRAY.

5. Since October 31, 2018, I have discovered seven females believed to be associated with a straw purchase/firearms trafficking ring. These females are responsible for straw purchasing over thirty handguns during approximately a two month period. All of these handguns are believed to have been purchased at the direction of, and paid for by, Ruemondo MURRAY, a convicted felon.

Ruemondo MURRAY

6. Ruemondo Juan MURRAY was previously convicted of a state felony for unarmed robbery in 2013. MURRAY also has prior state felonies for another unarmed robbery and a firearms offense in 2006.

7. Ruemondo MURRAY does not have a Federal Firearms License permitting him to repetitively buy and sell firearms.

8. On January 11, 2019, ATF executed a federal search warrant at MURRAY's residence at XXX11 Marlowe Street in Detroit, Michigan. In MURRAY's upstairs bedroom, agents located a Colt handgun, loaded with five rounds of ammunition, underneath his mattress.

Regina BLANCHARD

9. Regina BLANCHARD is a resident of Detroit, Michigan. On October 24, 2018, BLANCHARD went to the Dunham's Sports Store in Roseville, Michigan (a Federal Firearms Licensee, hereafter referred to as a FFL), and purchased four firearms, those being two Smith and Wesson SD9VE handguns and two Smith and Wesson SD40VE handguns.

10. On October 29, 2018, BLANCHARD then went to the Dunham's Sports Store in Warren, Michigan, and purchased four more firearms, again being two Smith and Wesson SD9VE handguns and two Smith and Wesson SD40VE handguns.

11. On November 2, 2018, I interviewed BLANCHARD regarding her purchases. According to BLANCHARD, on October 24, 2018, BLANCHARD met with a male she knows as "White Boy," who gave her \$1500 and instructed her to go to Dunham's in Roseville and purchase the four Smith and Wesson handguns she

bought that day. BLANCHARD stated that she had about \$230 left over and she was told that was hers to keep for straw purchasing the guns for the male.

12. BLANCHARD then stated that on October 29, 2018, she was picked up by a woman she knows as Crystal, who she believed to be the male's (White Boy) sister. Crystal drove BLANCHARD to Dunham's to purchase more firearms for this same male. BLANCHARD stated that another woman accompanied BLANCHARD to Dunham's on this date and this woman also purchased two Smith and Wesson handguns. Crystal instructed BLANCHARD to send photos of the guns to the other woman so she would know what to buy. BLANCHARD's phone records indicate that she sent a text message with photos attached on October 29, 2018, to a phone number that belonged to Shakira MAY, and sales records revealed that MAY purchased firearms from the same Dunham's as BLANCHARD on October 29, 2018.

13. BLANCHARD stated that when she went to purchase the second four handguns, she took the first four out of her house and gave them to Crystal. She then left the second four handguns that she purchased that day in the car with Crystal. BLANCHARD was told she would get about half the profit from the sales of the guns, as this unidentified male told her that he could make "way more on the streets than what they were going for in the store".

14. On March 21, 2019, Peel Regional Police Service, Ontario, Canada, executed a search warrant in Ontario on a storage unit. Police found, among other things, two firearms that traced back to BLANCHARD's purchase on October 24, 2018.

15. BLANCHARD described White Boy as a black male, medium complexion, approximately 5'8", 170 lbs., with no facial hair. I was present for the January 11, 2019, search warrant on Ruemondo MURARY's house and was able to see him for an extended period, and found BLANCHARD's description to be consistent with Ruemondo MURRAY's physical appearance. I observed Ruemondo MURRAY to be a black male, medium complexion, of a thin build, with multiple tattoos on his neck and face. Phone records indicate that, between September 30, 2018, and November 28, 2018, there were over 330 contacts between BLANCHARD and phone numbers registered to Ruemondo MURRAY.

Shakira MAY

16. Shakira Janel MAY is a resident of Detroit, MI. On October 29, 2018, MAY went to the Dunham's Sports Store in Warren, Michigan, and purchased two firearms, a Smith and Wesson SD40VE handgun and a Smith and Wesson SD9VE handgun.

17. On December 21, 2018, I interviewed MAY, who explained that she went with a female whom she knew (identified here as LS) and another unknown

female (previously identified as Regina BLANCHARD) to a Dunham's in Warren, Michigan, to purchase firearms. MAY stated that LS provided the money for the firearms, and MAY purchased two firearms and BLANCHARD purchased either two or four firearms that same day.

18. MAY claimed that after they bought the firearms, they went back to LS's house. Once they arrived, an unidentified male took the guns from MAY. MAY described this black male as light skinned, approximately 6'0", thin build (140-150 lbs.), no facial hair, and tattoos all over his neck and face. This unidentified male then left with the firearms that MAY had just bought with LS's money.

19. Phone records indicate that, between September 30, 2018 and November 28, 2018, there were over 39 contacts between MAY and a phone number registered to Ruemondo MURRAY.

Precious PREVOT

20. Precious Hope PREVOT is a resident of Detroit, Michigan. On October 20, 2018, PREVOT went to the Dunham's Sports Store in Warren, Michigan, and purchased two firearms, those being a Smith and Wesson SD9VE handgun and a Smith and Wesson SD40VE handgun.

21. On October 27, 2018, PREVOT then went to the Dunham's Sports Store in Warren, Michigan and purchased four more firearms. These are two Smith and Wesson SD9VE handguns and two Smith and Wesson SD40VE handguns.

22. On November 23, 2018, I interviewed Precious PREVOT. PREVOT claimed that she met a black male known to her only as "Sonny" (described by PREVOT as having a medium to light complexion, approximately 5'8", approximately 150 lbs., tattoos on his face, neck, and arms, short hair) roughly one year ago, again matching Ruemondo MURRAY.

23. PREVOT stated that Sonny called her on October 20, 2018, and asked her to purchase some guns for him. Sonny picked PREVOT up and drove her to a Dunham's on that same day. Sonny showed PREVOT photos of a sales ad or coupon that pictured the firearms that he wanted her to buy. Sonny gave PREVOT cash for the firearms and stayed in the vehicle while PREVOT went into Dunham's and purchased the firearms that he requested. PREVOT believes she purchased four Smith and Wesson handguns on this date.

24. Sonny then picked PREVOT up again approximately one week later and drove her to Dunham's to make another purchase. Sonny again gave PREVOT money for the four firearms that he told her to purchase, and waited in the vehicle while she went in and bought the firearms. PREVOT recalls that she purchased four Smith and Wesson handguns and left the firearms in the vehicle with Sonny when he took her home. PREVOT stated that she has not seen the firearms since she purchased them for Sonny.

25. PREVOT stated that Sonny told her he would give her half of his profit from selling the firearms. PREVOT recalls paying approximately \$350 for each of the firearms.

26. A comparison of phone records indicates that one of the phone numbers used by Sonny to communicate with PREVOT belonged to Ruemondo MURRAY at the time. Between September 30, 2018 and November 28, 2018, there were 159 contacts between PREVOT and Ruemondo MURRAY's phone number.

Yalandra HARDRICK

27. Yalandra Latrice HARDRICK is a resident of Detroit, Michigan. On November 4, 2018, HARDRICK went to the Dunham's Sports Store in Warren, Michigan, and purchased four firearms. These are two Smith and Wesson SD9VE 9mm handguns, and two Smith and Wesson SD40VE .40 caliber handguns.

28. On December 12, 2018, HARDRICK went to Recoil Firearms and purchased with cash a Taurus G2C 9mm handgun and a Ruger Security-9 9mm handgun.

29. A Recoil Firearms employee who completed the sale to HARDRICK recalls that HARDRICK spoke to an unknown male a couple times on her phone while she was inside the store. This employee recalls that HARDRICK was telling this unknown male on the phone that she was finishing up, and that she would be outside soon, indicating that someone was waiting for her in the parking lot.

30. I reviewed Recoil Firearms video footage from December 12, 2018, and watched HARDRICK walk out to what appeared to be a silver Chevy Malibu, get in the passenger side, and leave the parking lot in this vehicle.

31. Additionally, during the search of Ruemondo MURRAY's house on Marlowe Street on January 11, 2019, agents located empty pistol boxes for a Ruger handgun and a Taurus handgun, both boxes had the firearm serial number on the box. The serial numbers corresponded to the firearms purchased by Yalandia HARDRICK on December 12, 2018.

32. On January 17, 2019, I interviewed Yalandia HARDRICK who stated that the firearms she purchased were for a black male, approximately 5'8"-5'10", medium build, with tattoos on his face. HARDRICK stated that in October this male picked her up to purchase firearms, and there was another unidentified female in the car, who also ended up purchasing firearms on this same date. HARDRICK stated that after each purchase she was paid approximately \$200 by MURRAY, and the firearms were left with MURRAY.

33. A review of HARDRICK's phone records from around the time of the purchases indicate that she was calling a phone number that belonged to Ruemondo MURRAY while at Recoil Firearms, and that she was also communicating with a phone number that belonged to Shakira MAY, suggesting that MAY was the other person who accompanied them on December 12, 2018. Between September 30, 2018

and November 28, 2018, phone records show 27 contacts between HARDRICK's phone number and a number that belonged to Ruemondo MURRAY.

Tiffany SIMMONS

34. Tiffany Monique SIMMONS is a resident of Detroit, Michigan. On October 12, 2018, SIMMONS went to the Dunham's Sports Store in Farmington Hills, Michigan, and purchased two firearms, a Taurus G2C handgun and a Ruger Security-9 handgun.

35. On October 17, 2018, TIFFANY SIMMONS then went to the Dunham's Sports Store in Warren, Michigan, and purchased two more firearms. These were two Ruger EC9S handguns.

36. According to records at the Michigan Department of Corrections, Ruemondo MURRAY had over 240 contacts with TIFFANY SIMMONS when he was incarcerated between December 2014 and February 2017. MURRAY also listed SIMMONS as his significant other.

37. According to state records, TIFFANY SIMMONS is also the registered owner of a 2015 Chevy Malibu. On December 18, 2018, I conducted surveillance at XXX11 Marlowe Street, Detroit, Michigan, which is the address on MURRAY's driver's license. On December 18, 2018, while surveilling this address, I observed a silver Chevy Malibu pull up in front of XXX11 Marlowe. I saw Ruemondo MURRAY get out of the driver's seat and go into this address by letting himself in

the front door. I also observed a black female who looked like TIFFANY SIMMONS in the passenger seat. Approximately three minutes later, MURRAY came out of the house, got back in the Malibu, and drove away. The Malibu is silver and otherwise appears to be same car in which HARDRICK departed from the Recoil Firearms parking lot on December 12, 2018.

Candace SIMMONS

38. Candace SIMMONS is a resident of Detroit, Michigan, and is the sister of TIFFANY SIMMONS. On October 12, 2018, SIMMONS went to the same Dunham's in Farmington Hills, Michigan, where TIFFANY SIMMONS had purchased the handguns described in Paragraph 34. CANDACE SIMMONS purchased a Taurus G2C handgun from the same employee who sold the handguns to TIFFANY SIMMONS. On October 20, 2018, CANDACE SIMMONS went to Recoil Firearms in Taylor, Michigan, and purchased a Ruger LCPII .380 caliber handgun and a Smith and Wesson SD40VE .40 caliber handgun.

39. During their March 21, 2019, search of a storage unit, Peel Regional Police Service in Ontario, Canada, also found, in addition to the guns purchased by BLANCHARD described above in Paragraph 14, the Smith and Wesson SD40VE handgun that had been purchased by CANDACE SIMMONS on October 20, 2018.

40. According to phone records, between September 30, 2018 and November 28, 2018, there were 14 contacts between Candace SIMMONS's phone number and a number that belonged to Ruemondo MURRAY.

Tywana MURRAY

41. Tywana MURRAY is a resident of Detroit, Michigan. On October 18, 2018, MURRAY went to the Dunham's in Farmington Hills, Michigan, and purchased with cash one Ruger EC9S 9mm handgun and one Smith and Wesson SD40VE .40 caliber handgun. The Dunham's sales records contained a note that MURRAY had called a couple of days after the purchase to report that the guns had been stolen. There is no record of these firearms being reported as stolen with the Detroit Police Department.

42. The Dunham's sales receipt, Dunham's gun safety form, price tags, and copies of the Michigan State Police RI-060 pistol sales records for these two firearms were found at Ruemondo MURRAY's house during the search on January 11, 2019. I interviewed Tywana MURRAY on February 14, 2019. Tywana MURRAY claimed that she bought the guns for herself but could not explain why the paperwork was in Ruemondo MURRAY's house. She again stated that the guns had been stolen from her shortly after she bought them. She also described the gun she purchased as a "Smith and Wilson."

ATF Forms

43. To purchase a firearm, the purchaser must fill out a federal form entitled “Firearms Transaction Record,” or ATF Form 4473. On every Form 4473, question 11.a. asks whether the individual filling out the form is the “actual transferee/buyer,” and warns that “You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person.” Under federal law, with a few exceptions, (i.e. gifts) the purchaser is not allowed to purchase a firearm for someone else. This is called a “straw purchase,” and violates 18 U.S.C. § 922(a)(6), which prohibits making a false statement during the purchase of a firearm.

44. I have acquired all of the ATF Forms 4473 completed by the suspected straw purchasers at the respective FFLs for each of the firearms purchases described in this affidavit. On all of the ATF Forms 4473, the straw purchaser indicated that she was the “actual transferee/buyer” of the firearm.

45. In interviews with BLANCHARD, MAY, PREVOT, and HARDRICK, they have each stated that they purchased multiple handguns—many of similar or identical make and model—over an extremely short period of time, for another individual. Also based on my interviews of these straw purchasers, it is believed that Ruemondo MURRAY has directed all of these females to purchase the firearms on his behalf, and MURRAY has funded the purchase of all of the firearms. The description that BLANCHARD, MAY, PREVOT, and HARDRICK gave matches

the description of MURRAY. Tiffany SIMMONS, Candace SIMMONS, and Tywana MURRAY, who have past associations with Ruemondo MURRAY, also purchased similar models of handguns within this same time period. Based on my training and experience, and daily interaction with the firearms trade, none of the firearms purchased by these women have any collector's value. In fact, all of the firearms purchased are among the most commonly recovered guns from crimes in the Detroit area.

46. I know, based on my training, experience and past firearms trafficking investigations, that individuals who purchase or orchestrate purchases of multiples inexpensive handguns, particularly in a short period of time, are often illegal firearms dealers. I know from my training and experience, having traced hundreds of firearms and my almost daily interaction with firearms and the firearms industry that all of the firearms purchased by these women fit into this illegal trafficking category.

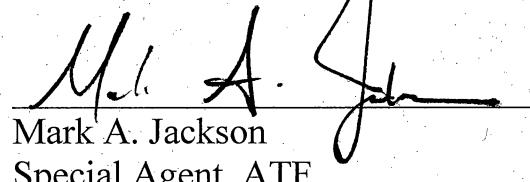
47. None of the handguns listed above are registered with the State of Michigan, as required by state law. I know that this failure to register firearms is often done in an attempt to avoid law enforcement detection and scrutiny if trafficked firearms are recovered.

48. Special Agent Josh McLean conducted a preliminary review of the list of firearms straw purchased in this investigation, and he indicated that at least the

majority of the firearms were manufactured outside the state of Michigan after 1898, thus affecting interstate commerce.

49. Based on these facts, I have probable cause to believe that Regina BLANCHARD, Shakira MAY, Precious PREVOT, Yalandra HARDRICK, Tiffany SIMMONS, Candace SIMMONS, and Tywana MURRAY did knowingly commit violations of 18 U.S.C. § 922(a)(6) (false statement during purchase of a firearm), 18 U.S.C. § 2 (aid and abet) and 18 U.S.C. § 371 (conspiracy), and Ruemondo MURRAY did knowingly commit violations of 18 U.S.C. § 2 (aid and abet) and 18 U.S.C. § 371 (conspiracy), and 18 U.S.C. § 922(g)(1) (possession of a firearm by a prohibited person).

Respectfully Submitted,



Mark A. Jackson
Special Agent, ATF

Sworn to before me and signed in my presence and/or by reliable electronic means



Hon. R. Steven Whalen
United States Magistrate Judge

DATE: JUL 30 2019